

## **FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7349**

### **ICICLE SEAFOODS, INC. (Surimi Division)**

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7349. The Department of Ecology (the Department) proposes to issue this permit, which will allow discharge of pretreated seafood process wastewater to the City of Bellingham Post Point Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities that discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected.

<b>GENERAL INFORMATION</b>	
Facility Name and Address	ICICLE SEAFOODS, INC. (Surimi Division) P.O. Box 79003 500 West Orchard Bellingham, Washington 98225
Type of Facility	Seafood Analog Processing
Facility Discharge Location	Latitude: 48° 46' 52" N.      Longitude: 122° 28' 35" W.
Treatment Plant Receiving Discharge	City of Bellingham, Post Point Wastewater Treatment Facility WA-002374-4
Contact at Facility	Mr. Kevin Harbine, R & D/Quality Assurance Manager (360) 756-5817
Responsible Official	Mr. Ralph G. Hoard, Executive Vice President P.O. Box 79003, Seattle, WA 98119 FAX #: (360) 734-8321

## **TABLE OF CONTENTS**

BACKGROUND INFORMATION .....	3
DESCRIPTION OF THE FACILITY .....	3
Industrial Processes.....	3
Solid Waste .....	3
Treatment Processes.....	3
PERMIT STATUS.....	3
SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT .....	3
WASTEWATER CHARACTERIZATION .....	3
PROPOSED PERMIT LIMITATIONS.....	4
TECHNOLOGY-BASED EFFLUENT LIMITATIONS .....	4
EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS.....	4
COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT .....	5
MONITORING REQUIREMENTS .....	5
OTHER PERMIT CONDITIONS .....	5
REPORTING AND RECORDKEEPING .....	5
OPERATIONS AND MAINTENANCE.....	5
PROHIBITED DISCHARGES.....	5
DILUTION PROHIBITED .....	6
GENERAL CONDITIONS .....	6
PUBLIC NOTIFICATION OF NONCOMPLIANCE .....	6
RECOMMENDATION FOR PERMIT ISSUANCE .....	6
REFERENCES FOR TEXT AND APPENDICES.....	6
Appendices.....	7
APPENDIX A—PUBLIC INVOLVEMENT INFORMATION .....	7
APPENDIX B—GLOSSARY .....	8

## **BACKGROUND INFORMATION**

### *DESCRIPTION OF THE FACILITY*

Icicle Seafoods, Inc.-Surimi (Icicle-Surimi) facility is located in Bellingham, Whatcom County. They lease space from Bellingham Cold Storage and have been operating at this location for many years. They discharge process and cleanup wastewater to a baffled dock sump for treatment prior to discharge to the City of Bellingham sanitary sewer system.

### **INDUSTRIAL PROCESSES**

Raw materials, including dry ingredients, food additives and frozen surimi (fish), are mixed, extruded, cooked, cooled, packaged, pasteurized and cooled or frozen at this facility. The finished product is boxed and stored or shipped. This facility produces about 14 million pounds of imitation crab meat annually.

The majority of wastewater is from clean-up activities. Process wastewater flows reach a daily maximum of close to 100,000 gpd after ice water, domestic water and water consumed in production is subtracted.

Icicle-Surimi generally operates 5 days a week.

### **SOLID WASTE**

Solid waste is generated from product spilled on the floor and screened solids in the wastewater sump. Solid waste is disposed of in the dumpster and is incinerated by the City of Bellingham with other waste.

### **TREATMENT PROCESSES**

Wastewater generated from processing and clean-up activities discharges to grated floor drains then flows to a screened and baffled sump in the west dock.

### *PERMIT STATUS*

The previous permit for this facility was issued on August 13, 1993 and expired August 13, 1998. An application for permit renewal was submitted and accepted by the Department on June 17, 1998. The permit was extended August 17, 1998.

### *SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT*

The facility last received a compliance inspection (without sampling) on November 10, 1998. A Notice of Violation and Penalty was issued February 6, 1998 and May 11, 1998 respectively, because of failure to submit three years of permit required quarterly discharge monitoring reports (DMRs). The permit required submittals have been complete and timely since this enforcement action.

### *WASTEWATER CHARACTERIZATION*

The concentration of pollutants in the discharge is summarized below from the quarterly discharge monitoring reports submitted in 1998. The proposed wastewater discharge is characterized for the following parameters:

*FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7349*  
*Icicle Seafoods, Inc. (Surimi)*

Parameter	Average	Range of Values
Average flow (gpd)	43,052	34,519-49,700
Maximum flow (gpd)		85,356-94,149
BOD <sub>5</sub> , mg/L	125 mg/L	65-220 mg/L
TSS, mg/L	64.1 mg/L	28.8-88.5 mg/L
pH, std units		6.1-9.1

**PROPOSED PERMIT LIMITATIONS**

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the WWTP (local limits). Wastewater must be treated using all known, available, and reasonable methods of treatment (AKART) and not interfere with the operation of the WWTP.

The minimum requirements to demonstrate compliance with the AKART standard for fish processors were determined in the EPA contract document, *Reassessment of Effluent Limitations Guidelines and New Source Performance Standards for the Canned and Preserved Seafood Processing Point Source Category* (1979), as coarse screening followed by fine mesh screening (20 mesh or finer). There are no categorical limitations for surimi or imitation crab processing so screening and solids separation (via a baffled sump) have been accepted as satisfying AKART for this facility.

*TECHNOLOGY-BASED EFFLUENT LIMITATIONS*

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). The following permit limitations are necessary to satisfy the requirement for AKART:

All process wastewater including clean-up water, must be screened and pass through a solids separation sump prior to discharge to the Bellingham WWTP.

The pH must be between 6.0 and 9.5 standard units.

*EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS*

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving WWTP such as interference, pass-through or hazardous exposure to WWTP workers nor will it result in unacceptable pollutant levels in the WWTP's sludge.

The flow limitations are based on the permittee's application. Previous flow values were reported from the daily meter readings of water coming into the facility. These values were high because domestic wastewater, exhaust flows and water used in the product were included in

*FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7349*  
*Icicle Seafoods, Inc. (Surimi)*

these figures. This permit requires subtracting these non-wastewater flow values from the incoming meter readings to more closely represent wastewater flows discharged to the Bellingham sanitary sewer system.

*COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT*

Parameter	Existing Limits	Proposed Limits
Flow	110,000 gpd maximum	100,000 gpd maximum
pH	Between 6-9.5 std units	Between 6-9.5 std. units

**MONITORING REQUIREMENTS**

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110). The monitoring location has been identified as after screening and grease separation located at the west end loading dock sump, and prior to discharge to the Bellingham sanitary sewer system.

The monitoring schedule is detailed in the proposed permit under Special Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for biochemical oxygen demand (BOD) and total suspended solids (TSS) is being required to quantify the loadings to the Bellingham WWTP. These pollutants have the potential to significantly impact the operations at the WWTP.

**OTHER PERMIT CONDITIONS**

*REPORTING AND RECORDKEEPING*

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e), (g), and (h)].

*OPERATIONS AND MAINTENANCE*

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

*PROHIBITED DISCHARGES*

Certain pollutants are prohibited from being discharged to the WWTP. These include substances that cause pass-through or interference; pollutants, which may cause damage to the WWTP or harm to the WWTP workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

### ***DILUTION PROHIBITED***

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

### ***GENERAL CONDITIONS***

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to WWTP permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

### **PUBLIC NOTIFICATION OF NONCOMPLIANCE**

A list of all industrial users, which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters, may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

### **RECOMMENDATION FOR PERMIT ISSUANCE**

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of 5 years.

### **REFERENCES FOR TEXT AND APPENDICES**

Permit Application submitted June 17, 1998.

EPA contract document, *Reassessment of Effluent Limitations Guidelines and New Source Performance Standards for the Canned and Preserved Seafood Processing Point Source Category* (1979)

## **APPENDICES**

### *APPENDIX A—PUBLIC INVOLVEMENT INFORMATION*

The Department has tentatively determined to reissue a permit to Icicle Seafoods-Surimi, Bellingham as specified on page 1 of this fact sheet. The permit contains conditions and effluent limitations that are described in the rest of this fact sheet.

Public notice of application was not required for this permit because there is no increase in flow or characteristic of wastewater from the last permit.

The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator  
Department of Ecology  
Northwest Regional Office  
3190-160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (425) 649-7201, or by writing to the address listed above.

This permit and fact sheet were written by Lori LeVander.

*APPENDIX B—GLOSSARY*

**Best Management Practices (BMPs)**—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

**BOD<sub>5</sub>**—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD<sub>5</sub> is used in modeling to measure the reduction of dissolved oxygen in receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

**Bypass**—The intentional diversion of waste streams from any portion of the collection or treatment facility.

**Categorical Pretreatment Standards**—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a WWTP by existing or new industrial users in specific industrial subcategories.

**Compliance Inspection - Without Sampling**—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

**Compliance Inspection - With Sampling**—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

**Composite Sample**—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite”(collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

**Engineering Report**—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

**Grab Sample**—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

**Industrial User**—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

**Industrial Wastewater**—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

**Interference**— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the WWTP, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the WWTP's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) [including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA], sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

**Local Limits**—Specific prohibitions or limits on pollutants or pollutant parameters developed by a WWTP.

**Maximum Daily Discharge Limitation**—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

**Pass-through**— A discharge which exits the WWTP into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the WWTP's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

**pH**—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

**Potential Significant Industrial User**—A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the WWTP (e.g., facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

**Significant Industrial User (SIU)—**

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the WWTP (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the WWTP treatment plant; or is designated as such by the Control Authority\* on the basis that the industrial user has a reasonable potential for adversely affecting the WWTP's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the WWTP's operation or for violating any pretreatment standard or requirement, the Control Authority\* may at any time, on its own initiative or in response to a petition received from an industrial user or WWTP, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

\*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated WWTPs or to the WWTP in the case of delegated WWTPs.

**Slug Discharge**—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the WWTP. This may include any pollutant released at a flow rate, which may cause interference with the WWTP.

**State Waters**—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

**Stormwater**—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

**Technology-based Effluent Limit**—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

**Total Suspended Solids (TSS)**—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic faunas. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

**Water Quality-based Effluent Limit**—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.